

ESTTA Tracking number: **ESTTA715238**Filing date: **12/17/2015**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**Notice of Opposition**

Notice is hereby given that the following party opposes registration of the indicated application.

Opposer Information

Name	Zenbanx Holding Ltd.		
Entity	Corporation	Citizenship	Delaware
Address	650 Naamans Road Suite 207 Claymont, DE 19703 UNITED STATES		

Attorney information	John A. Clifford Merchant & Gould P.C. P.O. Box 2910 Minneapolis, MN 55402-9944 UNITED STATES jclifford@merchantgould.com, aavery@merchantgould.com, dockm- pls@merchantgould.com Phone:612.336.4616
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Applicant Information

Application No	86459217	Publication date	11/17/2015
Opposition Filing Date	12/17/2015	Opposition Period Ends	12/17/2015
International Registration No.	NONE	International Registration Date	NONE
Applicant	Matthew Morley 32 Grande rue Charles de Gaulle Asnieres sur Seine, 92600 FRANCE		

Goods/Services Affected by Opposition

Class 036. First Use: 0 First Use In Commerce: 0

All goods and services in the class are opposed, namely: Financial and monetary services, namely, financial information, management and analysis services; banking services; insurance services, namely, insurance information services and insurance consultation services; charitable fundraising; financial services, namely, business fundraising for others; charitable services, namely, providing financial sponsorship of cultural events; and financial sponsorship of sport events; currency exchange and advice; currency trading services; currency transfer services; financial services, namely, providing a virtual electronic currency for use by, and transfer of virtual electronic currency among, members of an on-line community via a global computer network; financial services, namely, providing a virtual digital currency for use by, and transfer of virtual digital currency among, members of an on-line community via a global computer network; financial services, namely, providing a virtual crypto-currency for use by, and transfer of virtual crypto-currency among, members of an on-line community via a global computer network; cash management, namely, facilitating and tracking transfers of electronic cash equivalents; virtual currency exchange transaction services for transferable electronic cash equivalent units having specified cash value; provision of prepaid cards and tokens, namely, processing electronic payments made through prepaid purchase cards and prepaid purchase tokens; real estate agency services; electronic financial services provided by means of the internet, namely,


providing a virtual currency for use by members of an on-line community via a global computer network; credit card services; money transfer services; electronic funds transfer services; processing payments to and from third parties, namely, bill payment services; foreign exchange transactions; financial transaction services, namely, providing secure commercial transaction and payment options using a mobile device at a point of sale; providing secure commercial transactions and payment options via electronic communications networks; financial transaction services, namely, providing secure commercial transaction and payment options using a mobile device at a point of sale; person-to-person financial services via electronic communications network, namely, financial advice and consultation services; clearing and reconciling financial transactions via electronic communications networks; banking services; financial services, namely, providing for the exchange of foreign currency, commodities, financial derivatives, interest rate products, and equities via the internet and intranet systems; business banking; consumer banking; electronic banking via electronic communications networks; payment services, namely, bill payment services, credit card payment processing services, and payment processing services in the field of credit card, tax, insurance payments and payments for general merchandise; electronic payment services, namely, electronic bill payment services, electronic credit card payment processing services, and electronic payment processing services in the field of credit card, tax, insurance payments and establishing funded accounts used to purchase goods and services on the Internet; electronic wallet services, namely, payment processing in the field of credit card, tax, insurance payments and establishing funded accounts used to purchase goods and services on the Internet; processing electronic payments made through prepaid cards and tokens; payment processing services in the field of credit card, tax, insurance payments and establishing funded accounts used to purchase goods and services on the Internet; payment administration services, namely, check payment guarantee services; financial transfers and transactions, namely, providing electronic transfer of a virtual currency for use by members of an on-line community via a global computer network; payment and receipt of money as agents, namely, debt recovery and debt collection agencies; currency dealing, namely, currency exchange services, currency trading services, and currency transfer services; currency trading; currency exchange services; brokerage of currency; swaps of currency rates, namely, currency exchange services; currency exchange rate quotations; financial services provided by mobile telephone connections, near field communication connections, retail point of sale connections and the internet, namely, mobile banking and mobile money transfers; mobile purchasing, namely, providing electronic processing of credit card, debit card, prepaid gift card, stored value card and electronic payments via mobile phone for allowing consumers pay bills and purchase goods and services of others; electronic payment services involving electronic processing and subsequent transmission of bill payment data; automated electronic payment services involving electronic processing and subsequent transmission of bill payment data; merchant services, namely, payment transaction processing services via the Internet; money transfer services; electronic funds transfer services; bill payment services; automated bill payment services; payment transaction card services, namely, credit card and debit card transaction processing services; electronic commerce payment services, namely, establishing funded accounts used to purchase goods and services on the Internet; credit card and payment card services; financial payment services, namely, providing secure commercial transactions and payment options; information services relating to the payment of on-line store value accounts, electronic commerce payment accounts, funded to purchase and pay for goods and services via the Internet, and credit card accounts; processing of payments for banks, namely, funding online cash accounts from bank accounts; bill payment processing and transaction services


Grounds for Opposition

Priority and likelihood of confusion	Trademark Act section 2(d)
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Marks Cited by Opposer as Basis for Opposition

U.S. Registration No.	4827351	Application Date	07/03/2012
Registration Date	10/06/2015	Foreign Priority Date	NONE
Word Mark	ZENBANX		


Design Mark	
Description of Mark	NONE
Goods/Services	Class 036. First use: First Use: 2015/03/17 First Use In Commerce: 2015/03/17 Financial services, namely, money transfer services; foreign exchange transactions; clearing and reconciling financial transactions via electronic communications networks; banking and financial services, namely, business banking, consumer banking, electronic banking via electronic communications networks

U.S. Registration No.	4748600	Application Date	07/30/2013
Registration Date	06/02/2015	Foreign Priority Date	NONE
Word Mark	ZENPAY		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 036. First use: First Use: 2015/01/15 First Use In Commerce: 2015/01/15 Financial services, namely, money transfer services, electronic funds transfer services, electronic processing of electronic funds transfers, ACH and electronic payments to and from third parties; financial transaction services, namely, providing secure transactions and payment options via electronic communications networks; financial transaction services, namely, providing secure commercial transactions and payment options using a mobile device; person-to-person financial services in the nature of money transfers, and electronic funds transfer, ACH, electronic check and electronic payment processing services via electronic communications networks; clearing and reconciling financial transactions via electronic communications networks		


U.S. Application No.	85588625	Application Date	04/04/2012
Registration Date	NONE	Foreign Priority Date	NONE
Word Mark	ZENPAY		


Design Mark	
Description of Mark	NONE
Goods/Services	Class 036. First use: First Use: 0 First Use In Commerce: 0 Credit card payment processing services; Merchant services, namely, payment transaction processing services; Payment processing services, namely, credit card and debit card transaction processing services; Providing electronic processing of electronic funds transfer, ACH, creditcard, debit card, electronic check and electronic payments

U.S. Application No.	86674632	Application Date	06/25/2015
Registration Date	NONE	Foreign Priority Date	NONE


Word Mark	ZENCASH
Design Mark	
Description of Mark	NONE
Goods/Services	Class 036. First use: First Use: 0 First Use In Commerce: 0 Financial services, namely, money transfer services, electronic funds transfer services, electronic processing of electronic funds transfers, ACH, credit card, debit card, stored value card, electronic check and electronic payments to and from third parties, foreign exchange transactions; financial transaction services, namely, providing secure commercial transactions and payment options via electronic communications networks; financial transaction services, namely, providing secure commercial transactions and payment options using a mobile device; person-to-person financial services in the nature of money transfers, banking services, and electronic funds transfer, ACH, credit card, debit card, stored value card, electronic check and electronic payment services via electronic communications networks; clearing and reconciling financial transactions via electronic communications networks; banking and financial services, namely, business banking, consumer banking, electronic banking via electronic communications networks

U.S. Application	86736666	Application Date	08/25/2015
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No.			
Registration Date	NONE	Foreign Priority Date	NONE
Word Mark	ZENRATE		
Design Mark			
Description of Mark	NONE		
Goods/Services	<p>Class 036. First use: First Use: 0 First Use In Commerce: 0</p> <p>Financial services, namely, money transfer services, electronic funds transfer services, electronic processing of electronic funds transfers, automated clearing house, credit card, debit card, storedvalue card, electronic check and electronic payments to and from third parties,foreign exchange transactions; financial transaction services, namely, providing secure commercial transactions and payment options via electronic communications networks; financial transaction services, namely, providing secure commercialtransactions and payment options using a mobile device; person-to-person financial services in the nature of money transfers, banking services, and electronic funds transfer, automated clearing house, credit card, debit card, stored value card, electronic check and electronic payment services via electronic communications networks; clearing and reconciling financial transactions via electronic communications networks; banking and financial services, namely, business banking,consumer banking, electronic banking via electronic communications networks</p>		

U.S. Application No.	85899332	Application Date	04/09/2013
Registration Date	NONE	Foreign Priority Date	NONE
Word Mark	ZENBANX USA		
Design Mark			
Description of Mark	<p>The mark consists of the wording "ZenBanx USA" whereby "ZenBanx" is denoted in boldface with the letters "Z" and "B" incapital lettering, and "USA" is in all capital lettering.</p>		
Goods/Services	<p>Class 036. First use: First Use: 2015/02/15 First Use In Commerce: 2015/02/15</p> <p>Financial services, namely, money transfer services, electronic funds transfer services, processing payments to and from third parties, namely, credit card anddebit card transaction processing services; foreign exchange transactions; financial transaction services, namely, providing secure commercial transactions</p>		

	and payment options via electronic communication networks; financial transaction services, namely, providing secure commercial transactions and payment options via electronic communications networks using a mobile device; person-to-person financial services in the nature of money transfers, banking services, and electronic funds transfer, ACH, credit card, debit card, stored value card, electronic check and electronic payment processing services via electronic communications networks; clearing and reconciling financial transactions via electronic communications networks; banking and financial services, namely, business banking, consumer banking, electronic banking via electronic communications networks
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U.S. Application No.	85668212	Application Date	07/03/2012
Registration Date	NONE	Foreign Priority Date	NONE
Word Mark	ZENMONEY		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 036. First use: First Use: 0 First Use In Commerce: 0 financial services, namely, money transfer services, electronic funds transfer services, electronic processing of electronic funds transfers, ACH, credit card, debit card, stored value card, electronic check and electronic payments to and from third parties, foreign exchange transactions; financial transaction services, namely, providing secure commercial transactions and payment options via electronic communications networks; financial transaction services, namely, providing secure commercial transactions and payment options using a mobile device; person-to-person financial services in the nature of money transfers, banking services, and electronic funds transfer, ACH, credit card, debit card, stored value card, electronic check and electronic payment processing services via electronic communications networks; clearing and reconciling financial transactions via electronic communications networks; banking and financial services, namely, business banking, consumer banking, electronic banking via electronic communications networks		

Attachments	85668145#TMSN.png(bytes) 86023004#TMSN.png(bytes) 85588625#TMSN.png(bytes) 86674632#TMSN.png(bytes) 86736666#TMSN.png(bytes) 85899332#TMSN.png(bytes) 85668212#TMSN.png(bytes) 201 12 17 Zencoin (Morley) Notice of Opposition.PDF(138529 bytes)
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Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Signature	/John A. Clifford/
Name	John A. Clifford
Date	12/17/2015

Zenbanx Holding Ltd.,)	
)	
Opposer,)	Opposition No. _____
)	
v.)	Serial No.: 86/459,217
)	Mark: ZENCOIN
Matthew Morley,)	
)	
Applicant)	
)	

NOTICE OF OPPOSITION

Zenbanx Holding Ltd., a corporation duly organized and existing under the laws of Delaware, with a mailing address of 650 Naamans Road, Suite 207, Claymont, DE 19703, believes that it will be damaged by the registration of the ZENCOIN mark shown in Application Serial No. 86/459,217, filed November 19, 2014 by Matthew Morley, a citizen of New Zealand, having a mailing address of 32 Grande rue Charles de Gaulle, Asnieres sur Seine 92600, France and hereby opposes registration of the mark. The grounds for opposition are as follows:

1. By the application herein opposed, Applicant is seeking to obtain under the provisions of the Trademark Act of 1946 as amended, registration on the Principal Register of the trademark “ZENCOIN” for the following:

Financial and monetary services, namely, financial information, management and analysis services; banking services; insurance services, namely, insurance information services and insurance consultation services; charitable fundraising; financial services, namely, business fundraising for others; charitable services, namely, providing financial sponsorship of cultural events; and financial sponsorship of sport events; currency exchange and advice; currency trading services; currency transfer services; financial services, namely, providing a virtual electronic currency for use by, and transfer of virtual electronic currency among, members of an on-line community via a global computer network; financial services, namely, providing a virtual digital currency for use by, and transfer of virtual digital currency among, members of an on-line community via a global computer network; financial services, namely, providing a virtual crypto-currency for use

by, and transfer of virtual crypto-currency among, members of an on-line community via a global computer network; cash management, namely, facilitating and tracking transfers of electronic cash equivalents; virtual currency exchange transaction services for transferable electronic cash equivalent units having specified cash value; provision of prepaid cards and tokens, namely, processing electronic payments made through prepaid purchase cards and prepaid purchase tokens; real estate agency services; electronic financial services provided by means of the internet, namely, providing a virtual currency for use by members of an on-line community via a global computer network; credit card services; money transfer services; electronic funds transfer services; processing payments to and from third parties, namely, bill payment services; foreign exchange transactions; financial transaction services, namely, providing secure commercial transaction and payment options using a mobile device at a point of sale; providing secure commercial transactions and payment options via electronic communications networks; financial transaction services, namely, providing secure commercial transaction and payment options using a mobile device at a point of sale; person-to-person financial services via electronic communications network, namely, financial advice and consultation services; clearing and reconciling financial transactions via electronic communications networks; banking services; financial services, namely, providing for the exchange of foreign currency, commodities, financial derivatives, interest rate products, and equities via the internet and intranet systems; business banking; consumer banking; electronic banking via electronic communications networks; payment services, namely, bill payment services, credit card payment processing services, and payment processing services in the field of credit card, tax, insurance payments and payments for general merchandise; electronic payment services, namely, electronic bill payment services, electronic credit card payment processing services, and electronic payment processing services in the field of credit card, tax, insurance payments and establishing funded accounts used to purchase goods and services on the Internet; electronic wallet services, namely, payment processing in the field of credit card, tax, insurance payments and establishing funded accounts used to purchase goods and services on the Internet; processing electronic payments made through prepaid cards and tokens; payment processing services in the field of credit card, tax, insurance payments and establishing funded accounts used to purchase goods and services on the Internet; payment administration services, namely, check payment guarantee services; financial transfers and transactions, namely, providing electronic transfer of a virtual currency for use by members of an on-line community via a global computer network; payment and receipt of money as agents, namely, debt recovery and debt collection agencies; currency dealing, namely, currency exchange services, currency trading services, and currency transfer services; currency trading; currency exchange services; brokerage of currency; swaps of currency rates, namely, currency exchange services; currency exchange rate quotations; financial services provided by mobile telephone connections, near field communication connections, retail point of sale connections and the internet, namely, mobile banking and mobile money transfers; mobile purchasing, namely, providing electronic processing of credit card, debit card, prepaid gift card, stored value card and electronic payments via mobile phone for allowing consumers pay bills and purchase goods and services of others; electronic payment services involving electronic processing and subsequent transmission of bill payment data; automated electronic payment services involving electronic processing and

subsequent transmission of bill payment data; merchant services, namely, payment transaction processing services via the Internet; money transfer services; electronic funds transfer services; bill payment services; automated bill payment services; payment transaction card services, namely, credit card and debit card transaction processing services; electronic commerce payment services, namely, establishing funded accounts used to purchase goods and services on the Internet; credit card and payment card services; financial payment services, namely, providing secure commercial transactions and payment options; information services relating to the payment of on-line store value accounts, electronic commerce payment accounts, funded to purchase and pay for goods and services via the Internet, and credit card accounts; processing of payments for banks, namely, funding online cash accounts from bank accounts; bill payment processing and transaction services, in International Class 36 (“Applicant’s Mark” or “ZENCOIN mark”).

2. Applicant’s ZENCOIN Application Ser. No. 86/459,217 was filed on November 19, 2014, claiming priority from United Kingdom Registration No. 3,078,111 registered on February 20, 2015 and having a filing date of October 22, 2014 for priority purposes.

3. Applicant’s Mark published for opposition on November 17, 2015. This Notice of Opposition is timely filed before the due date of December 17, 2015.

4. Opposer is the owner of the following current U.S. Trademark Registrations and Applications:

ZENBANX, U.S. Registration No. 4,827,351, used in connection with financial services, namely, money transfer services; foreign exchange transactions; clearing and reconciling financial transactions via electronic communications networks; banking and financial services, namely, business banking, consumer banking, electronic banking via electronic communications networks, in International Class 36. The application leading to this registration was filed on July 3, 2012 and Opposer is entitled to the benefit of constructive nationwide use of the ZENBANX mark as of the filing date.

ZENPAY, U.S. Registration No. 4,748,600, used in connection with financial services, namely, money transfer services, electronic funds transfer services, electronic processing of electronic funds transfers, ACH and electronic payments to and from third parties; financial transaction services, namely, providing secure transactions and payment options via electronic communications networks; financial transaction services, namely, providing secure commercial transactions and payment options using a mobile device; person-to-person financial services in the nature of money transfers, and electronic funds transfer, ACH, electronic check and electronic payment processing services via electronic communications

networks; clearing and reconciling financial transactions via electronic communications networks, in International Class 36. The application leading to this registration was filed in the U.S. on July 30, 2013 and claims priority from Canadian Application Number 1,612,053 filed on January 30, 2013. Opposer is entitled to the benefit of constructive nationwide use of the ZENPAY mark as of the filing date.

ZENPAY, U.S. Application Serial No. 85/588,625, for Credit card payment processing services; Merchant services, namely, payment transaction processing services; Payment processing services, namely, credit card and debit card transaction processing services; Providing electronic processing of electronic funds transfer, ACH, credit card, debit card, electronic check and electronic payments, in International Class 36. This application has a filing date of April 4, 2012 and received its Notice of Allowance on November 13, 2012.

ZENCASH, U.S. Application Serial No. 86/674,632, for financial services, namely, money transfer services, electronic funds transfer services, electronic processing of electronic funds transfers, ACH, credit card, debit card, stored value card, electronic check and electronic payments to and from third parties, foreign exchange transactions; financial transaction services, namely, providing secure commercial transactions and payment options via electronic communications networks; financial transaction services, namely, providing secure commercial transactions and payment options using a mobile device; person-to-person financial services in the nature of money transfers, banking services, and electronic funds transfer, ACH, credit card, debit card, stored value card, electronic check and electronic payment services via electronic communications networks; clearing and reconciling financial transactions via electronic communications networks; banking and financial services, namely, business banking, consumer banking, electronic banking via electronic communications networks, in International Class 36. This application has a filing date of June 25, 2015 and has received it Notice of Allowance on November 17, 2015.

ZENRATE, U.S. Application Serial No. 86/736,666, for financial services, namely, money transfer services, electronic funds transfer services, electronic processing of electronic funds transfers, automated clearing house, credit card, debit card, stored value card, electronic check and electronic payments to and from third parties, foreign exchange transactions; financial transaction services, namely, providing secure commercial transactions and payment options via electronic communications networks; financial transaction services, namely, providing secure commercial transactions and payment options using a mobile device; person-to-person financial services in the nature of money transfers, banking services, and electronic funds transfer, automated clearing house, credit card, debit card, stored value card, electronic check and electronic payment services via electronic communications networks; clearing and reconciling financial transactions via electronic communications networks; banking and

financial services, namely, business banking, consumer banking, electronic banking via electronic communications networks, in International Class 36. This application has a filing date of August 25, 2015.

ZENBANXUSA, U.S. Application Serial No. 85/899,332, for financial services, namely, money transfer services, electronic funds transfer services, processing payments to and from third parties, namely, credit card and debit card transaction processing services; foreign exchange transactions; financial transaction services, namely, providing secure commercial transactions and payment options via electronic communication networks; financial transaction services, namely, providing secure commercial transactions and payment options via electronic communications networks using a mobile device; person-to-person financial services in the nature of money transfers, banking services, and electronic funds transfer, ACH, credit card, debit card, stored value card, electronic check and electronic payment processing services via electronic communications networks; clearing and reconciling financial transactions via electronic communications networks; banking and financial services, namely, business banking, consumer banking, electronic banking via electronic communications networks, in International Class 36. This application has a filing date of April 9, 2013 and received its Notice of Allowance on June 3, 2014.

-and-

ZENMONEY, U.S. Application Serial No. 85/668,212, for financial services, namely, money transfer services, electronic funds transfer services, electronic processing of electronic funds transfers, ACH, credit card, debit card, stored value card, electronic check and electronic payments to and from third parties, foreign exchange transactions; financial transaction services, namely, providing secure commercial transactions and payment options via electronic communications networks; financial transaction services, namely, providing secure commercial transactions and payment options using a mobile device; person-to-person financial services in the nature of money transfers, banking services, and electronic funds transfer, ACH, credit card, debit card, stored value card, electronic check and electronic payment processing services via electronic communications networks; clearing and reconciling financial transactions via electronic communications networks; banking and financial services, namely, business banking, consumer banking, electronic banking via electronic communications networks, in International Class 36.

5. Opposer has priority with respect to the mark at issue in this opposition. Opposer has had priority of use of the term ZEN as a mark, or part of a mark, since long before the November 19, 2014 filing date of Applicant's application, or the foreign priority date claimed by Applicant of October 22, 2014.

6. Opposer's registered marks are valid and subsisting, and are prima facie evidence of Opposer's exclusive right to use said marks in commerce on the services specified in each registration. Opposer's applications establish Opposer's *bona fide* rights in said marks, and contingent upon completing registration of the marks, establish Opposer's *prima facie* exclusive right to use said marks in commerce. The above registrations and applications establish that Opposer has a family of marks consisting of the word ZEN, combined with another word for financial services within International Class 36. The marks listed in paragraph 4 above shall be referred to herein as "Opposer's ZEN marks."

7. Opposer uses and intends to use its ZEN marks in conjunction with a wide range of financial services. Opposer's services are closely related to the services Applicant intends to offer, under Applicant's ZENCOIN mark, namely a range of financial and monetary services. Opposer's services and Applicant's services are overlapping, competitive and closely related. The customers and consumers for Applicant's ZENCOIN services are likely to also purchase and use Opposer's services.

8. Opposer has advertised and promoted its ZEN marks extensively. For example, Opposer maintains the website www.zenbanx.com where its services are promoted. Opposer has also made substantial sales under Opposer's said ZEN marks. As a result of such use and promotion, Opposer's ZEN marks have developed and represent valuable goodwill inuring to the benefit of Opposer.

9. The common element of the term ZEN in Opposer's marks creates a family of marks for Opposer such that use of the term ZEN as part of the mark ZENCOIN for financial services by Applicant creates a likelihood of confusion because such a mark will appear to be a member of Opposer's family of ZEN marks and will be confusingly similar thereto.

10. Applicant's ZENCOIN mark is confusingly similar to Opposer's ZEN marks, and appears to be a member of Opposer's family of marks. The marks of the parties individually and collectively have an overall confusingly similar appearance, sound, meaning and commercial impression. Applicant's services are highly and closely related to Opposer's services.

11. Consumers will mistakenly believe that Applicant's services are offered by Opposer when the same is not true.

12. Due to the highly similar nature of Applicant's mark and Opposer's marks, the closely related nature of the services provided by the respective parties, consumers and potential consumers are likely to believe that Applicant's services originate from Opposer, resulting in a likelihood of confusion in the marketplace, and damage to Opposer.

13. The use and registration by Applicant of the mark ZENCOIN for Applicant's services is likely to cause confusion among consumers and potential consumers, with Opposer's previously used marks, again resulting in damage to Opposer.

14. If Applicant is granted registration of the mark herein opposed, it would thereby obtain at least a *prima facie* exclusive right to the use of its alleged mark. Such registration would be a source of further damage and injury to Opposer, and could bar Opposer from obtaining future registrations of its ZEN family of marks, or otherwise expanding its family of ZEN marks for financial services

15. Registration of the mark shown in Application Serial No. 86/459,217 will result in damage to Opposer under the provisions of §2(d) of the U.S. Trademark Act, 15 U.S.C. §§ 1052 and pursuant to the allegations stated above. Therefore Applicant's mark should be refused registration.

WHEREFORE, Opposer asks that its opposition to this application be sustained and that the registration of the proposed mark ZENCOIN set forth therein be refused. Please direct all correspondence to the attention of:

John A. Clifford
Merchant & Gould P.C.
P.O. Box 2910
Minneapolis, MN 55402-0910
Tel: 612-336-4616 Fax: 612-332-9081

Opposer hereby appoints: John A. Clifford; Danielle I. Mattessich; Heather Kliebenstein, Brian H. Batzli; Gregory C. Golla; Scott W. Johnston; Andrew S. Ehard; Christopher J. Schulte; and Brent Routman as its attorneys with the full power to represent the Opposer in connection with this proceeding.

Respectfully submitted,

ZENBANX HOLDING LTD.

By its attorneys,

A handwritten signature in blue ink that reads "Jack Clifford". The signature is written in a cursive, flowing style.

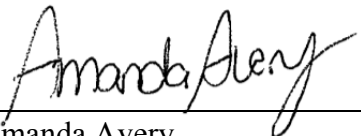
Date: 12/17/2015

John A. Clifford
MERCHANT & GOULD P.C.
P.O. Box 2910
Minneapolis, MN 55402-0910
Tel. 612.336.4616
Fax 612.332.9081

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **NOTICE OF
OPPOSITION** was served, via first-class mail, postage prepaid this 17th day of December 2015.

Alexander Lazouski
LAZOUSKI IP LLC
14726 Bowfin Ter., Suite 1
Lakewood Ranch, FL 34202-5814



Amanda Avery